

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**FRANK LIU,**

Plaintiff,

v.

**THE NIELSON COMPANY (US) ET AL.,**

Defendants.

Case No. 1:22-cv-09084(JHR)

Judge Jennifer H. Rearden

**DEFENDANTS THE NIELSEN  
COMPANY US LLC AND TNC US  
HOLDINGS' NOTICE OF MOTION  
TO DISMISS**

PLEASE TAKE NOTICE THAT, upon the Memorandum of Law in Support of its Motion to Dismiss and the accompanying Declaration of Caitlin W. Tran and exhibits thereto, Defendants The Nielsen Company US LLC and TNC US Holdings ("Defendants"), by and through their undersigned attorneys, hereby move this Court for (i) an Order granting Defendants' Motion to Dismiss, with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and (ii) such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 11 of the Court's Individual Rules and Practices in Civil Pro Se Cases, answering papers are due to be served within four (4) weeks of service of this motion.

Dated: May 23, 2023

**WINSTON & STRAWN LLP**

By /s/ Caitlin W. Tran

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